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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
 JEREMY DAVIS, CHRISTOPHER
 CASTILLO, and MONIQUE TRUJILLO
 individually and on behalf of all similarly
 situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

William Christopher Carmody
 (admitted *pro hac vice*)
 Shawn J. Rabin (admitted *pro hac vice*)
 Steven M. Shepard (admitted *pro hac vice*)
 Alexander Frawley (admitted *pro hac vice*)
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Case No.: 4:20-cv-03664-YGR-SVK

**PLAINTIFFS' ADMINISTRATIVE
 MOTION TO SEAL PORTIONS OF
 PLAINTIFFS' OBJECTIONS TO THE
 SPECIAL MASTER'S REPORT AND
 RECOMMENDATION (DKT. 524)**

The Honorable Susan van Keulen
 Courtroom 6 – 4th Floor
 Date: May 3, 2022
 Time: 2:00 PM

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC (“Google”)’s material should be sealed. This material is included in Plaintiffs’ Objections to the Special Master’s Report and Recommendation (the “Objections”). The material has been designated by Google as “Confidential” or “Highly Confidential – Attorneys’ Eyes Only.” This motion to seal pertains to the following information in the Objections:

Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing Portion of Document
Plaintiffs’ Objections	Google	Portions highlighted in yellow throughout	Refers to material designated “Confidential” and “Highly Confidential” pursuant to the Protective Order
Declaration of Mark C. Mao in Support of Plaintiffs’ Objections (“Mao Decl.”)	Google	Portions highlighted in yellow throughout	Refers to material designated “Confidential” and “Highly Confidential” pursuant to the Protective Order
Exhibit 1 of the Mao Declaration	Google	Entirety	Material designated “Confidential” and “Highly Confidential” pursuant to the Protective Order
Declaration of Christopher Thompson (“Thompson Decl.”)	Google	Portions highlighted in yellow throughout	Refers to material designated “Confidential” and “Highly Confidential” pursuant to the Protective Order
Exhibits A-B of the Thompson Declaration	Google	Entirety	Material designated “Confidential” and “Highly Confidential” pursuant to the Protective Order

Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the responsibility to establish that its designated material is sealable.

Dated: April 15, 2022

Respectfully submitted,

By: /s/ Amanda Bonn

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